



THE CITY OF NEW YORK
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December 20, 2022

VIA ECF

Honorable Nina Morrison
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., 16 cv 79 (NM) (CLP)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Eric Ryan, Joseph DiGennaro, Keith Laliberte and David Camhi in the above-referenced matter. Defendants respectfully write in response to the Court's December 13, 2022 Order to "submit an agreed upon briefing schedule for any post-trial motions."

The parties have conferred and have agreed upon the following briefing schedule for post-trial motions, including motions pursuant to Fed. R. Civ. P. 50 and 59:

- Post-trial motions to be filed by January 27, 2023;
- Oppositions to be filed by February 27, 2023; and
- Replies to be filed by March 13, 2023.

Thank you for your consideration.

Respectfully,

/s/ *Kavin Thadani*

Kavin Thadani
Senior Counsel
Special Federal Litigation

cc: **VIA ECF**
Gabriel Harvis, Esq.
Baree Fett, Esq.
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Attorneys for Plaintiff